

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: AMERICAN MEDICAL
COLLECTION AGENCY, INC.,
CUSTOMER DATA SECURITY
BREACH LITIGATION

*This Document Relates to:
All Actions Against Laboratory Corporation of
America Holdings*

Case No. 2:19-MD-02904-MCA-MAH

MDL 2904

**JOINT STIPULATION AND ORDER
EXTENDING DEFENDANT
LABORATORY CORPORATION OF
AMERICA HOLDINGS' DEADLINE TO
ANSWER THE FIRST AMENDED
CONSOLIDATED CLASS ACTION
COMPLAINT**

WHEREAS, on May 5, 2023, the Court granted in part and denied in part Defendant Laboratory Corporation of America Holdings' ("Labcorp") Motion to Dismiss the First Amended Consolidated Class Action Complaint ("Complaint") [ECF No. 507];

WHEREAS the Court gave Plaintiffs thirty days from the date of the Court's Letter Order—i.e., until June 5, 2023—to cure the deficiencies identified therein;

WHEREAS Plaintiffs elected not to amend the Complaint by June 5, 2023;

WHEREAS the Parties jointly stipulated that Labcorp shall submit its Answer to the Complaint by July 5, 2023;

WHEREAS the Court entered that stipulation on June 14, 2023 [ECF No. 529];

WHEREAS the Court entered a stipulation on June 21, 2023 extending the Sonic Defendants' response deadline to August 4, 2023 [ECF No. 539];

WHEREAS Labcorp respectfully requests an additional thirty days to submit its Answer to the Complaint, which aligns with the Sonic Defendants' response deadline of August 4, 2023;

WHEREAS Plaintiffs do not oppose the extension to August 4, 2023;

WHEREAS the requested extension is made in good faith, not for purposes of delay, and will not prejudice any party or the Court;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that Labcorp shall submit its Answer to the First Amended Consolidated Class Action Complaint on or before August 4, 2023.

**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & ANGNELLO, P.C.**
Lead Counsel for Plaintiffs

By: /s/ James E. Cecchi
James E. Cecchi

**HOGAN LOVELLS US LLP
McCARTER & ENGLISH, LLP**
*Counsel for Defendant Laboratory
Corporation of America Holdings*

By: /s/ Edward J. Fanning, Jr.
Edward J. Fanning, Jr.

SO ORDERED this 5th day of July, 2023

SO ORDERED

~~MICHAEL A. HAMMER, U.S.M.J.~~
/s/ Michael A. Hammer
Michael A. Hammer, U.S.M.J.

Date: